

SITE-WIDE NATIONAL ENVIRONMENTAL POLICY ACT REVIEW
Federal Energy Technology Center
January 31, 1998

An evaluation of the value of performing a site-wide National Environmental Policy Act (NEPA) review (i.e., environmental impact statement or environmental assessment) was performed for the two sites (Morgantown, WV, and Pittsburgh, PA) operated by the Federal Energy Technology Center (FETC), using the criteria outlined below. Based on this evaluation, neither the Morgantown nor the Pittsburgh site was determined to be one where a site-wide analysis would facilitate future National Environmental Policy Act compliance efforts.

Cumulative Impact Analysis

Both the Morgantown and the Pittsburgh sites of FETC are locations for Department of Energy (DOE) research, facilities maintenance, and administrative activities that primarily support DOE's Fossil Energy and Environmental Management programs. These on-site activities represent a small portion (e.g., one-tenth) of the total DOE program implemented by FETC.

The on-site research and maintenance activities at the Morgantown and Pittsburgh sites consist of a collection of many small projects that vary on an annual basis. By class of activity, the scales and scopes of these activities fall into categories of actions that the Department has determined to be encompassed within classes of actions that do not individually or cumulatively have a significant impact on the environment. The scales of activities currently being conducted at each site, for the most part, remain relatively constant year-to-year, and this has been the case historically for research performed by FETC. For the foreseeable future, this situation is expected to exist.

The combination of all research and maintenance activities at each site has periodically been examined as part of either a planning or a performance process. From these evaluations, the collective environmental effects from activities at each site are insignificant. Neither site maintains any permanent storage or disposal areas that could potentially become sources of significant impacts. With fiscal year 1997 being the year of consolidation of the Morgantown and Pittsburgh sites under a unified management structure, substantial emphasis has been focused on the establishment of streamlined, consistent procedures. A procedure involving annual, cumulative environmental analysis of planned on-site research and maintenance activities is being pursued.

No local off-site developments or activities to which FETC would add environmental stresses are underway or known to be planned. Thus, no situations exist where cumulative environmental effects or impacts could become a concern. Furthermore, no production operations exist at either site. All on-site research consists of non-continuous, small-scale experiments that, in the extreme, run for one to two-week periods.

Efficiency

The scopes of FETC's on-site activities are determined on an annual basis and vary year to year. While their details change annually, these activities typically total 20-30 small research projects within specific mission areas assigned to FETC. The types of actions performed on-site are covered within Appendixes A and B of

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10 CFR Part 1021. Due to their small-scale nature, they can efficiently be evaluated individually and collectively on an annual basis in the absence of a site-wide review.

Tiering

A site-wide NEPA document would not preclude the need for annual reviews of the scopes and natures of individual project issues. Due to the relatively small scale and small number of on-site activities, supplemental reviews of activities typically comprising actions that qualify for categorical exclusion would not result in a less complex analysis.

Segmentation

Research activities typically consist of distinct experimental efforts of a nature determined by the Department to be categorically excluded from environmental assessment or environmental impact statement levels of review. These activities are independently developed on an annual basis and are stand-alone activities that are not segments of larger activities that would trigger a more extensive level of review.

Land Use Planning

Activities at the Pittsburgh site are dispersed geographically within the 239-acre Bruceton Research Center, a Federal research site located approximately 13 miles south of Pittsburgh. FETC is a tenant at this site, for which the National Institute for Occupational Safety and Health is landlord to both DOE and an office of the Mine Safety and Health Administration. Activities at the Morgantown site are more compact, being situated on 35 developed acres of a 132-acre DOE site, where DOE is landlord to a facility owned by the U.S. Navy. The Morgantown site is within, but on the outskirts of, the City of Morgantown.

The FETC facilities at Morgantown and Pittsburgh are bordered by residential areas that have developed over the years since location of the Federal facilities at these two sites. Laboratory and research operations at both sites are conducted in numerous buildings. As previously indicated, these activities may change in scope on an annual basis, but the scales of these activities are relatively constant. Thus, the available facilities at the two sites are such that FETC does not anticipate any reasonably foreseeable future need for additional site development or alternative land use.

Public Participation

FETC maintains public contacts and regularly solicits input regarding its on-site activities. At the Morgantown site, these public participation contacts have been highlighted by the establishment of a Community Interest Group that meets on roughly a quarterly basis to discuss site activities and community interests and concerns. This Group consists of neighborhood representatives and local municipal officials. Since its formation, this Group has provided a valuable forum for communicating local issues and concerns

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regarding activities at the Morgantown site; FETC has responded to these communications with actions to facilitate broader understanding and acceptance of site activities.

At the Pittsburgh site, public involvement has historically been achieved through less formal mechanisms. Local media solicitations and announcements have been used to obtain public input. With consolidation of the Morgantown and Pittsburgh sites, however, a more consistent approach to public participation is being implemented. Extensive use of the Internet is being used for communicating FETC activities and soliciting feedback. A formalized community interest group will be established for the Pittsburgh site using the successful model from Morgantown. In addition, for both sites, the on-going public interactions will continue to be supplemented by periodic open meetings where members of the public can observe FETC first-hand and participate in discussions of FETC's project activities. The next such meeting is planned in May for the Pittsburgh site.

Stakeholder Concerns

Since only a small portion of FETC's research and development activities are conducted on-site, the primary stakeholders in FETC's activities are associated with off-site projects. For these off-site activities, environmental considerations are initially addressed during the project formulation stage; these are then augmented by more detailed and more formal environmental analyses during the proposal evaluation stage. NEPA requirements are clearly communicated and the need for compliance with requirements and proper environmental stewardship is emphasized. Failure to achieve compliance can be grounds for removal from consideration for a Departmental action.

Conclusion

Based on the above considerations, we have concluded that a site-wide National Environmental Policy Act review for the Federal Energy Technology Center would not aid in streamlining the NEPA process, would not add additional value to decision-makers and the public, and would not reduce the time and cost required to prepare NEPA documents. Thus, development of a site-wide NEPA analysis is not planned.